

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
**FILED**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

AUG 9 2019

UNITED STATES OF AMERICA

v.

SHANNON NICHOLS (01)

CLERK U.S. DISTRICT COURT  
By: \_\_\_\_\_

No. 4:19-MJ-640 Deputy

**CRIMINAL COMPLAINT**

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about February 16, 2019, the defendant, **Shannon Nichols**, in the Northern District of Texas, did knowingly use, persuade, and induce a minor under the age of eighteen to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means. Specifically, **Nichols** used an Alcatel cell phone to produce the following depiction of minors engaged in sexually explicit conduct:

File name	Description of file
VID-20190216-WA0022.mp4	A video file, approximately 17 seconds in length, depicting a minor female with a black mask on her face performing oral sex on the penis of a prepubescent boy.

In violation of 18 U.S.C. § 2251(a).

I, Christopher Thompson, being duly sworn under oath, do hereby depose and state:

1. I am currently a Special Agent of the Federal Bureau of Investigation (FBI) since April 2004, and I am currently assigned to the Dallas Division.

2. I am currently assigned to a Child Exploitation Task Force, wherein my duties and responsibilities include investigating criminal violations relating to the sexual exploitation of children (SEOC). I have investigated SEOC violations since 2004 and have gained expertise in these types of investigations through training in seminars, classes, and my everyday work. In addition, I have received specialized training in the investigation and enforcement of federal child pornography laws in which computers are used as the means for producing, transmitting, collecting and storing child pornography.

3. This affidavit sets forth facts and suggest reasonable inferences from those facts, establishing that there is probable cause to believe that on or about February 16, 2019, in the Northern District of Texas, **Shannon Nichols** committed the offense of Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251.

4. The information contained in this affidavit is from my personal knowledge of the described investigation and from information obtained from other law enforcement agents.

#### OVERVIEW OF INVESTIGATION

5. On August 5, 2019, I met with a technician for a data recovery business that had reported discovery of child pornography on a hard drive submitted by a customer seeking data recovery. After meeting with the business representative and reviewing an image that depicted child pornography, I seized the hard drive and other associated drives and brought them to the FBI office located in Dallas, Texas.

6. A search warrant was obtained to conduct a forensic review of the hard drive. As a result of the analysis, I observed the following:

- a. In a folder labeled “Shannon meme” is the file “ZomboMeme 07122016014335.jpg” which depicts an adult Caucasian woman performing oral sex on the penis of a prepubescent male. Text at the bottom of the image reads “I WILL SUCK HIM WHEREVER... WHENEVER”.
  - b. In a folder labeled “fer” is file “20170109\_180008.jpg” which depicts an adult male subsequently identified as Tyrone Taylor wearing a white sleeveless undershirt lying on a bed with his pants down. A girl approximately 11 years of age wearing an orange shirt is seen holding a cell phone and placing her tongue on the erect penis of the adult male. The adult male is looking at the camera and smiling.
7. The data recovery technician had also recovered from the hard drive a Department of Veteran’s Affairs document with the name of “**Shannon Nichols**” in the title. I reviewed Accurant records for Taylor and observed that he is associated with “**Shannon Nichols**” at address [redacted] Belzise Terrace, Fort Worth, Texas 76104. I then obtained Texas Department of Motor Vehicle records for **Shannon Nichols** at that address. The driver’s license image matches the woman depicted in file “ZomboMeme 07122016014335.jpg.”
8. On August 8, 2019, search warrants for Taylor’s residence in Fort Worth and **Nichols’s** residence at [redacted] Belzise Terrace in Fort Worth were obtained; searches were conducted by FBI agents at each location on August 9, 2019. A black Western Digital Elements external hard drive was recovered from Taylor’s home.

On this hard drive in a folder labeled “Shannon meme” is the file “ZomboMeme 07122016014335.jpg,” which depicts an adult Caucasian woman’s mouth on the penis of a prepubescent minor male. Once again, the text at the bottom of the image reads “I WILL SUCK HIM WHEREVER... WHENEVER.”

9. After providing Taylor with his Miranda warnings, Taylor agreed to be interviewed. Taylor was shown the “ZomboMeme 07122016014335.jpg” file and recognized the image. He stated the woman in the image is **Shannon Nichols**. The child depicted in the image has also been identified as a real minor.

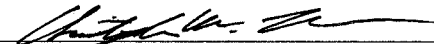
10. **Nichols** was present during the search of her home. She, too, was provided Miranda warnings and agreed to speak with agents. **Nichols** admitted to having files depicting the sexual exploitation of children on her cellular telephone. **Nichols** provided the passcode to access its contents.

11. On the device, Special Agents Peter Craanen and Jennifer Mullican observed a file, “**VID-20190216-WA0022.mp4**,” which is described as a video file, approximately 17 seconds in length, depicting a minor female with a black mask on her face performing oral sex on the penis of a prepubescent boy. **Nichols** stated that she took the video, and identified the minor female and the minor male. At the time of the video’s creation, the minor male was 10 years old and the minor female was 14 years old. **Nichols** also said that she took the video at her home in Fort Worth, Texas, using her cellular telephone.

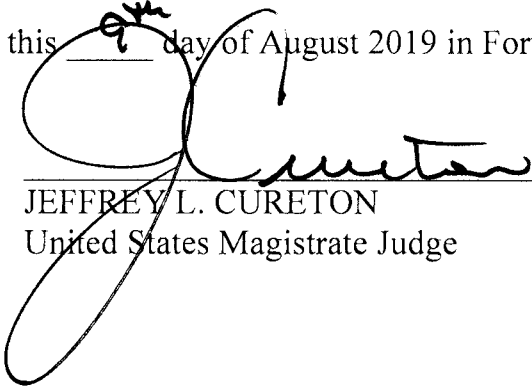
12. The phone used by **Nichols** is described as an Alcatel, model 6062W bearing IMEI number 016125003275118. The words "Made in China" are printed on the label. Therefore, there is probable cause to believe that the Alcatel cell phone itself traveled in interstate and foreign commerce.

**CONCLUSION**

13. Based on the facts and circumstances set forth in this affidavit, I respectfully submit that there is probable cause to believe that **Shannon Nichols** did knowingly use, persuade, and induce a minor under the age of eighteen to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was produced using materials that had been mailed, shipped or transported in and affecting interstate or foreign commerce by any means, in violation of 18 U.S.C. § 2251(a).

  
\_\_\_\_\_  
Christopher Thompson, Special Agent  
Federal Bureau of Investigation

Subscribed and sworn before me this 9<sup>th</sup> day of August 2019 in Fort Worth,  
Texas at 3:00 p.m.

  
\_\_\_\_\_  
JEFFREY L. CURETON  
United States Magistrate Judge